

March 5, 2001

MEMORANDUM TO: Joram Hopenfeld  
Engineering Research Applications Branch  
Division of Engineering Technology  
Office of Nuclear Regulatory Research

FROM: William D. Travers */RA/*  
Executive Director for Operations

SUBJECT: DIFFERING PROFESSIONAL OPINION ON  
STEAM GENERATOR TUBE INTEGRITY ISSUES

In a memorandum dated July 13, 1994, you initiated a Differing Professional Opinion (DPO) concerning the voltage-based interim repair criteria for steam generator tubes. You further clarified and identified additional concerns that have been documented in subsequent memoranda and public meetings with the Advisory Committee on Reactor Safeguards (ACRS). On July 20, 2000, I requested that the ACRS assist in the DPO process and function as the equivalent of an Ad Hoc panel, under Management Directive (MD) 10.159 to review your technical concerns. I requested that the ACRS provide me a summary report that documents its conclusions and any recommendations relative to the pertinent technical issues. Accordingly, the ACRS established an Ad Hoc Subcommittee that functioned under the provisions of the Federal Advisory Committee Act to review the technical merits of your concerns. The ACRS Ad Hoc Subcommittee completed its review of your concerns, and its findings are documented in NUREG-1740, "Voltage-Based Alternative Repair Criteria," dated February 2001. An advanced copy of the NUREG report was provided to you on February 1, 2001.

I have reviewed the report from the ACRS Subcommittee. The report provides a concise summary of the key issues and concerns and identifies those issues that have been satisfactorily resolved as well as areas where additional staff action is recommended. The Subcommittee found that the alternative repair criteria and the condition monitoring program endorsed by the staff can adequately protect public health and safety and that no immediate regulatory actions are necessary. However, it recommended several areas where additional technical effort should be undertaken.

I concur in the ACRS's findings and have issued a tasking memorandum requesting the staff to develop an action plan to address the conclusions and recommendations in the summary report. I have asked that the action plan be developed and provided to me within the next two months.

On the basis of (1) the ACRS Ad Hoc Subcommittee's finding that the alternative repair criteria and condition monitoring program can adequately protect public health and safety, (2) that the ACRS Ad Hoc Subcommittee did not conclude that any immediate regulatory actions were necessary, and (3) my direction that the staff develop an action plan to address the conclusions and recommendations in the summary report, I find that the concerns raised in your DPO have

been dispositioned. For those issues identified by the ACRS Subcommittee where additional technical effort is recommended, the staff is developing or will develop additional activities under a controlled process to ensure the issues are prioritized and evaluated in accordance with established procedures and consistent with agency goals. These actions complete the agency's process as delineated in MD 10.159 for consideration of your issues, and accordingly I consider the DPO to be closed.

I want to thank you for bringing your concerns about steam generator tube integrity and the alternative repair criteria to my attention. As a result of your concerns and the independent review of your issues by the ACRS Ad Hoc Subcommittee, areas where additional information can improve and confirm our regulatory programs have been identified and, as noted, will be pursued by the staff.

If you should have any further questions concerning the actions to resolve your DPO, please contact Isabelle Schoenfeld at 415-8705.

cc: W. Kane, DEDR  
C. Paperiello, DEDMRS  
S. Collins, NRR  
R. Zimmerman, NRR  
B. Sheron, NRR  
A. Thadani, RES  
M. Federline, RES  
J. Larkins, ACRS

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\*See previous concurrence

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